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December 7, 2020

VIA ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Victor Azrak, 14 CR 399 (ENV)

Dear Judge Vitaliano:

As part of the bail conditions set in the above-referenced case, Mr. Azrak's recognizance bond was secured by two properties: 414 Avenue S, Brooklyn, NY (owned by Sarah Azrak) and 1749 East 9th Street, Brooklyn, NY (owned by Adele Fallas). Both Mrs. Azrak and Mrs. Fallas received bail warnings at the time that the properties could be forfeited should Victor Azrak not comply with his bail conditions.

We write now, without objection from the Government or Pretrial Services, to request that this Court modify the bail conditions to substitute 414 Avenue S and 1749 East 9th Street with two different properties—404 Avenue S and 408 Avenue S—both owned by Sarah Azrak. Because Mrs. Azrak has already received the proper bail warnings when she posted her original property, we do not believe that she must again receive bail warnings. Thank you for your consideration.

Respectfully submitted,



Marc Agnifilo

cc: AUSA Shannon Jones (via ECF)
Pretrial Services Officer Melissa Roman (via email)